

# EXHIBIT C

---

**From:** Tezyan, Michael  
**Sent:** Wednesday, May 24, 2023 1:35 PM  
**To:** Rueckheim, Mike; Park, Ryuk; Quan, Liberty; #Netlist-Micron [Int]; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com  
**Cc:** Yaquian, Juan C.; Winston-Micron-Netlist  
**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions  
**Attachments:** 2023-05-24 Joint Mtn to Extend 4-3 Deadline.DOCX; 2023-05-24 Order re\_Joint Mtn to Amend DCO.DOCX

Mike,

We can agree in advance to Micron filing a sur-reply limited to addressing Dr. Stone's deposition testimony cited in Netlist's reply (to the extent Netlist's reply does so). Please let us know if you have any edits to the attached joint motion to amend the DCO and if we may sign on your behalf.

Thanks,  
Michael

**Michael Tezyan**

*Associate*

IRELL & MANELLA LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Direct: (310) 203-7536 | Email: [mtezyan@irell.com](mailto:mtezyan@irell.com)

---

**From:** Rueckheim, Mike <MRueckheim@winston.com>  
**Sent:** Tuesday, May 23, 2023 11:57 AM  
**To:** Tezyan, Michael <mtezyan@irell.com>; Park, Ryuk <RPark@winston.com>; Quan, Liberty <LQuan@winston.com>; #Netlist-Micron [Int] <Netlist-Micron@irell.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com  
**Cc:** Yaquian, Juan C. <JYaquian@winston.com>; Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>  
**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions

Michael, are you asking to depose Dr. Stone after Micron files its claim construction responsive brief? If so, will Netlist agree in advance to Micron filing a surreply to the extent that Netlist cites any deposition testimony in its reply briefing?  
-Mike

**Michael R. Rueckheim**

**Partner**

Winston & Strawn LLP  
D: +1 650-858-6433  
M: +1 713-444-4447  
[winston.com](http://winston.com)



---

**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>  
**Sent:** Tuesday, May 23, 2023 8:17 AM  
**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>; Quan, Liberty <[LQuan@winston.com](mailto:LQuan@winston.com)>; #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com)  
**Cc:** Yaquian, Juan C. <[JYaquian@winston.com](mailto:JYaquian@winston.com)>; Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>  
**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions

Counsel,

Can you please respond to my request for Dr. Stone's availability between 6/22 and 6/27, and Micron's willingness to extend the claim construction discovery deadline?

Thanks,  
Michael

**Michael Tezyan**

*Associate*

IRELL & MANELLA LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Direct: (310) 203-7536 | Email: [mtezyan@irell.com](mailto:mtezyan@irell.com)

---

**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>  
**Sent:** Friday, May 19, 2023 11:15 AM  
**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>; Quan, Liberty <[LQuan@winston.com](mailto:LQuan@winston.com)>; #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com)  
**Cc:** Yaquian, Juan C. <[JYaquian@winston.com](mailto:JYaquian@winston.com)>; Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>  
**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions

Ryuk,

No, I meant June. Is Dr. Stone available between 6/22 and 6/27?

Thanks,  
Michael

**Michael Tezyan**

*Associate*

IRELL & MANELLA LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Direct: (310) 203-7536 | Email: [mtezyan@irell.com](mailto:mtezyan@irell.com)

---

**From:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>

**Sent:** Friday, May 19, 2023 11:06 AM

**To:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>; Quan, Liberty <[LQuan@winston.com](mailto:LQuan@winston.com)>; #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com)

**Cc:** Yaquian, Juan C. <[JYaquian@winston.com](mailto:JYaquian@winston.com)>; Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>

**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions

Michael,

I assume you meant May, not June. Dr. Stone is additionally available on 5/25 (Thursday) and 5/26 (Friday). Let us know if these dates work for Netlist. Micron has no objections to moving the claim construction discovery deadline to 5/26.

Thanks,

Ryuk

**Ryuk Park**

**Of Counsel**

Winston & Strawn LLP

T: +1 650-858-6500

D: +1 650-858-6440

M: +1 607-242-9789

F: +1 650-858-6550

[winston.com](http://winston.com)



---

**From:** Tezyan, Michael <[mtezyan@irell.com](mailto:mtezyan@irell.com)>

**Sent:** Friday, May 19, 2023 9:35 AM

**To:** Park, Ryuk <[RPark@winston.com](mailto:RPark@winston.com)>; Rueckheim, Mike <[MRueckheim@winston.com](mailto:MRueckheim@winston.com)>; Quan, Liberty <[LQuan@winston.com](mailto:LQuan@winston.com)>; #Netlist-Micron [Int] <[Netlist-Micron@irell.com](mailto:Netlist-Micron@irell.com)>; [andrea@wsfirm.com](mailto:andrea@wsfirm.com); [ce@wsfirm.com](mailto:ce@wsfirm.com); [wh@wsfirm.com](mailto:wh@wsfirm.com); ~Baxter, Samuel <[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)>; [jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com)

**Cc:** Yaquian, Juan C. <[JYaquian@winston.com](mailto:JYaquian@winston.com)>; Winston-Micron-Netlist <[Winston-Micron-Netlist@winston.com](mailto:Winston-Micron-Netlist@winston.com)>

**Subject:** RE: Netlist v. Micron, 22-cv-203 (E.D. Tex.): Declaration of Harold Stone ISO Micron's Claim Construction Positions

Counsel,

We have not heard back from you regarding alternative dates for Dr. Stone's deposition. Given the difficulties in scheduling Dr. Stone's deposition within the current deadline for claim construction discovery and other conflicts, would Micron agree to offer Dr. Stone for deposition between 6/22-6/27 and extend the claim construction discovery deadline to 6/27? Please let us know.

Thanks,

Michael

**Michael Tezyan**

*Associate*

IRELL & MANELLA LLP